

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

UNITED STATES of AMERICA,

Plaintiff,

v.

GAVELSTON COUNTY, TEXAS, et al.

Defendants.

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Civil Action No. 3:22-cv-00093

**DEFENDANTS' CONSENT MOTION TO EXTEND
DEADLINE TO FILE RESPONSIVE PLEADING**

COMES NOW, Defendants Galveston County, Texas, Galveston County Commissioners Court, and Mark Henry in his capacity as Galveston County Judge (“Defendants”) and file this Consent Motion to Extend Deadline to File Responsive Pleading (“Motion”) pursuant to Fed. R. Civ. P. 6(b)(1)(A), asking the Court to extend Defendants’ deadline to file a responsive pleading to Plaintiff’s Original Complaint (ECF No. 1) to May 16, 2022. In support thereof, Defendants would respectfully show the Court the following:

1. On March 24, 2022, Plaintiffs filed their Original Complaint in this matter. *See* ECF No. 1.
2. Defendants’ deadline to file a responsive pleading to Plaintiff’s Original Complaint is April 25, 2022. Defendants seek an extension of their deadline to file a responsive pleading to Plaintiff’s Complaint to May 16, 2022.
3. Pursuant to Fed. R. Civ. P. 6(b)(1)(A), the Court may extend pending deadlines for good cause because the time for responding has not yet expired. Here, Defendants’ deadline to file a responsive pleading has not yet passed. Defendants seek this extension due to pressing

deadlines involving preliminary injunctions in other cases where Defense Counsel is involved and to consider possible consolidation with other related matters filed in this Court. *See Petteway, et al. v. Galveston County, Texas, et al.*, 3:22cv57.

4. The parties have agreed to a three-week extension of time until May 16, 2022 for Defendants to answer or otherwise respond to Plaintiff's Complaint.

5. Accordingly, Defendants respectfully request that the Court extend Defendants' deadline to file a responsive pleading to May 16, 2022.

6. Defendants have conferred with counsel for Plaintiff, Catherine Meza. Plaintiff consents to the relief requested in this Motion.

Respectfully submitted,

**HOLTZMAN VOGEL BARAN
JOSEFIAK & TORCHINSKY LLC**

/s/ Dallin B. Holt

Dallin B. Holt

Attorney in Charge

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**Pro hac vice forthcoming*

**CERTIFICATE OF
CONFERENCE**

I hereby certify that on April 15, 2022, I conferred with counsel for Plaintiff regarding the contents of this Motion. Plaintiff's counsel, Catherine Meza, has indicated that Plaintiffs consent to the relief requested herein.

/s/ Dallin B. Holt
Dallin B. Holt

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served on all counsel of record on April 20, 2022, through the CM/ECF system.

/s/ Dallin B. Holt
Dallin B. Holt